

Exhibit A
(Proposed Order)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

THE ART INSTITUTE OF PHILADELPHIA
LLC, *et al.*,

Debtors.

Chapter 7

Case No. 18-11535 (CTG)

(Jointly Administered)

GEORGE L. MILLER, Chapter 7 Trustee,

Plaintiff,

v.

TODD S. NELSON, JOHN R. McKERNAN,
SAMUEL C. COWLEY, EDWARD WEST,
MARK A. McEACHEN, FRANK JALUFKA,
J. DEVITT KRAMER, MARK NOVAD, JOHN
DANIELSON, AND MICK BEEKHUIZEN,

Defendants.

Adv. Proc. No. 20-50627 (CTG)

[PROPOSED] ORDER

AND NOW, this ____ day of _____, 2022, upon the Motion of Defendants West and Beekhuizen to Dismiss the First Amended Complaint (the “Motion”), and the opposition of the Trustee thereto, it is hereby ORDERED as follows:

1. The Motion is GRANTED.
2. The Trustee’s First Amended Complaint is DISMISSED WITH PREJUDICE.

THE HONORABLE CRAIG T. GOLDBLATT
UNITED STATES BANKRUPTCY JUDGE